

**LITE DEPALMA GREENBERG, LLC**

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*Attorneys for Defendants Hanmi USA, Inc.,  
Hanmi Pharmaceutical Co., Ltd.,  
Hanmi Fine Chemical Co., Ltd., and Hanmi  
Holdings Co., Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
THE DISTRICT OF NEW JERSEY**

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ASTRAZENECA AB, AKTIEBOLAGET  
HÄSSLE, ASTRAZENECA LP, KBI INC.,  
and KBI-E INC.,

Plaintiffs and  
Counterclaim Defendants,

v.

HANMI USA, INC., HANMI  
PHARMACEUTICAL CO., LTD., HANMI  
FINE CHEMICAL CO., LTD, and HANMI  
HOLDINGS CO., LTD.,

Defendants and  
Counterclaim Plaintiffs.

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Civil Action No. 3:11-CV-00760-JAP-TJB

**DECLARATION OF RENITA S. RATHINAM IN SUPPORT OF  
DEFENDANTS' RESPONSIVE *MARKMAN* SUBMISSION**

I, Renita S. Rathinam, state and declare as follows:

1. I am an attorney at law in the District of Columbia and an associate of Sughrue Mion, PLLC, attorneys for Defendants Hanmi USA, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd. (collectively “Hanmi”).

2. I submit this declaration in support of Hanmi’s Responsive *Markman* Submission.

3. True and accurate copies of the exhibits listed in the following table are being filed in support of Hanmi’s Responsive *Markman* Submission.

Exhibit No.	Description
1	Excerpts of 12/6/11 Deposition Transcript of Stephen G. Davies, Ph.D
2	Excerpts of 12/16/11 Deposition Transcript of Jerry L. Atwood, Ph.D
3	GESSNER G. HAWLEY, THE CONDENSED CHEMICAL DICTIONARY 105, 125, 479, 882 (Van Nostrand Reinhold Co.) (10th ed. 1981).
4	Christoph Y. Yung, <i>A Synopsis on Metals in Medicine and Psychiatry</i> , 21:1 PHARM. BIOCHEMISTRY & BEHAV. 41-47 (1984).
5	Pragya Sharma et al., <i>Beryllium-induced Toxicity and its Prevention by Treatment with Chelating Agents</i> , 20 J. APPLIED TOXICOLOGY 313-18 (2000).
6	Exhibit No. 10 of 12/6/11 Deposition of Stephen G. Davies, Ph.D
7	Anuj K. Dalal et al., <i>Acquired Long QT Syndrome and Monomorphic Ventricular Tachycardia After Alternative Treatment With Cesium Chloride for Brain Cancer</i> , 79:8 MAYO CLINIC PROC. 1065-69 (2004).
8	U.S. Patent No. 5,744,165
9	U.S. Patent No. 4,337,257
10	U.S. Patent No. 5,066,652
11	U.S. Patent No. 6,255,502
12	M. Karthikeyan et al., <i>Formulation and Comparative Studies of Diclofenac With Ompeprazole [sic] and Diclofenac With Pantoprazole</i> , 1:1 J. PHARM. & BIOMEDICAL SCIS. 1-4 (2010).
13	Periodic Table of Elements
14	Correspondence between J. Scherling and R. Rothman re the scope of the “R” group in claims 3 and 10
15	Hanmi First Amended Non-Infringement and Invalidity Contentions Pursuant to L.

Exhibit No.	Description
	Pat. R. 3.6
16	<i>Ex parte Diamond</i> , 123 USPQ 167 (Pat. Off. Bd. App. 1959)

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of January 2012.



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Renita S. Rathinam